

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,) Case No. 18-CR-577 CRB
Plaintiff,)
v.) STIPULATION REGARDING PR NEWSWIRE
MICHAEL RICHARD LYNCH and)
STEPHEN KEITH CHAMBERLAIN,)
Defendants.)

The United States and Defendants Michael Richard Lynch and Stephen Chamberlain hereby stipulate as follows:

1. Between March 2009 and August 2011, PR Newswire, based in New York, was engaged in the business of distributing news releases. PR Newswire distributed Autonomy Corporation plc press releases during this period, including a release dated February 1, 2011 titled “Autonomy Corporation plc Announced Results for the Year Ended December 31, 2010” and a release dated April 21, 2011 titled “Autonomy Corporation plc Trading Update for the Quarter Ended March 31, 2011.”

2. Autonomy releases were sent from PR Newswire servers in Hempstead, United Kingdom, to servers in New Jersey in the United States, and distributed to PR Newswire's "US1" network, which included media outlets in the Northern District of California such as the *San Francisco Chronicle*, *San Jose Mercury News*, *Silicon Valley/San Jose Business Journal*, and the *San Francisco*

1 Bureaus of *The New York Times*, the *Wall Street Journal*, Dow Jones, Reuters, and Bloomberg News.

2 IT IS SO STIPULATED AND AGREED.

3 DATED: April 12, 2024

PATRICK D. ROBBINS
4 Attorney for the United States

5 */s/ Robert S. Leach*

6 ROBERT S. LEACH
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9 DATED: April 12, 2024

CLIFFORD CHANCE US LLP

10 */s/ Christopher J. Morvillo*

11 CHRISTOPHER J. MORVILLO
12 CELESTE L.M. KOELEVLD
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13 Counsel for Defendant Michael Richard Lynch

14 BIRD, MARELLA, BOXER, WOLPERT, NESSIM,
15 DROOKS, LINCENBERG, & RHOW, P.C.

16 */s/ Gary S. Lincenberg*

17 GARY S. LINCENBERG
18 Counsel for Defendant Stephen Chamberlain